

1 ROBERT S. MUELLER, III (California State Bar No. 59775)
2 United States Attorney
3 Attorney for Plaintiff
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FILED
DEC 28 PM 1:29
ANDREW W. WICKING
U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA

12 Plaintiff,

13 v.

14 MICHAEL FREUTEL,

15 Defendant.

WH
CR-00-0659
Criminal No.

VIOLATIONS: 26 U.S.C. § 7206(1) --
Making and Subscribing False Tax
Returns

SAN FRANCISCO VENUE

16 I N F O R M A T I O N
17

18 The United States Attorney charges:

19 COUNT ONE: (26 U.S.C. § 7206(1))

20 On or about August 15, 1994, in the Northern District of California, the defendant

21 MICHAEL FREUTEL

22 did willfully make and subscribe a Form 1040 U.S. Individual Income Tax Return with his wife Arler
23 Freutel for the tax year 1993, which was verified by a written declaration that it was made under the
24 penalty of perjury and was filed with the Internal Revenue Service, which joint income tax return the
25 defendant did not believe to be true and correct as to every material matter, in that the defendant
26 willfully omitted material information concerning the business income reported on the return, in that
27 line 12 of the 1993 joint income tax return, the defendant claimed that their business income for the

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1 1993 tax year was \$38,233, when in truth and in fact, as the defendant well knew and believed, their
2 business income was in excess of that amount.

3 In violation of Title 26, United States Code, Section 7206(1).

4 COUNT TWO: (26 U.S.C. § 7206(1))

5 On or about August 9, 1995, in the Northern District of California, the defendant

6 MICHAEL FREUTEL

7 did willfully make and subscribe a Form 1040 U.S. Individual Income Tax Return with his wife Arlene
8 Freutel for the tax year 1994, which was verified by a written declaration that it was made under the
9 penalty of perjury and was filed with the Internal Revenue Service, which joint income tax return the
10 defendant did not believe to be true and correct as to every material matter, in that the defendant
11 willfully omitted material information concerning business income reported on the return, in that on
12 line 12 of the 1994 joint income tax return, the defendant claimed that their business income for the
13 1994 tax year was \$40,384, when in truth and in fact, as the defendant well knew and believed, their
14 business income was in excess of that amount.

15 In violation of Title 26, United States Code, Section 7206(1).

16 COUNT THREE: (26 U.S.C. § 7206(1))

17 On or about October 10, 1996, in the Northern District of California, the defendant

18 MICHAEL FREUTEL

19 did willfully make and subscribe a Form 1040 U.S. Individual Income Tax Return with his wife Arlene
20 Freutel for the tax year 1995, which was verified by a written declaration that it was made under the
21 penalty of perjury and was filed with the Internal Revenue Service, which joint income tax return the
22 defendant did not believe to be true and correct as to every material matter, in that the defendant
23 willfully omitted material information concerning business income reported on the return, in that on
24 line 12 of the 1995 joint income tax return, the defendant claimed that their business income for the
25 1995 tax year was \$36,645, when in truth and in fact, as the defendant well knew and believed, their
26 business income was in excess of that amount.

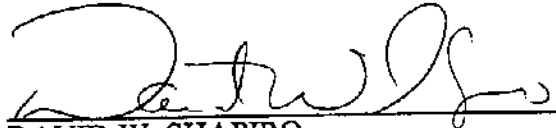
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In violation of Title 26, United States Code, Section 7206(1).

ROBERT S. MUELLER, III
United States Attorney



DAVID W. SHAPIRO
Chief, Criminal Section

Approved as to Form



AUSA
JAY R. WEILL